

CAUTION: External Email – Confirm legitimacy before clicking, opening attachments, or following instructions.

Aaron and others,

Please find attached updated copies of our testimony for tonight's Planning Commission meeting on the city Operations Complex. Please note that we are representing the Savanna Oaks Neighborhood Association.

We have also included summaries of our testimony for your convenience. There are also two location maps included also that were not included in our first submittal. For easy reference of all exhibits, we will also have a packet for each of you tonight.

Thank you all for your work for the community,
Roberta and Ed Schwarz
Savanna Oaks NA
West Linn

From: Gudelj, Aaron <agudelj@westlinnoregon.gov>
Sent: Monday, February 2, 2026 8:14 AM
To: Koper, Steve <skoper@westlinnoregon.gov>; Schwarz, Ed <ed.schwarz@gmail.com>; 'Roberta Schwarz' <roberta.schwarz@comcast.net>; Planning Commission (Public) <askthepc@westlinnoregon.gov>
Cc: Wyss, Darren <dwyss@westlinnoregon.gov>; Schroder, Lynn <LSchroder@westlinnoregon.gov>
Subject: RE: Public Testimony for CUP-25-02 / DR-25-02 / WAP-25-01

Ed and Roberta Schwarz-

Thank you for your comments. This is to confirm receipt of the second email and attachments. Please reach out if there is anything else,

Aaron Gudelj; Associate Planner
agudelj@westlinnoregon.gov; (503) 742-6057
<https://westlinnoregon.gov/>

From: Ed Schwarz <ed.schwarz@gmail.com>
Sent: Friday, January 30, 2026 5:40 PM
To: Planning Commission (Public) <askthepc@westlinnoregon.gov>
Cc: roberta.schwarz@comcast.net
Subject: Public Testimony for CUP-25-02 / DR-25-02 / WAP-25-01

CAUTION: External Email – Confirm legitimacy before clicking, opening attachments, or following instructions.

Please add the attached letters and exhibits to the public record for the February 4, 2026 Planning Commission hearing on the above-referenced application (agenda item 3).

Please acknowledge receipt of this email.

Thank you.

Ed and Roberta Schwarz

Steve Koper
Community Development Director
Community Development

#6058



Please consider the impact on the environment before printing a paper copy of this email.
This e-mail is subject to the State Retention Schedule and may be made available to the public

Aaron Gudelj
Associate Planner
Planning

22500 Salamo Rd.
West Linn, Oregon 97068
agudelj@westlinnoregon.gov
westlinnoregon.gov
503-742-6057



*****CONFIDENTIALITY NOTICE*****

This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law.
If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, you are hereby notified that the sender has not waived any privilege, and that you may not read, disclose, copy, distribute, use or take action based upon this transmission or any accompanying documents.

If you have received this transmission in error, please immediately notify this office, keep the contents confidential, and immediately delete the message and any attachments from your system.

Please consider the impact on the environment before printing a paper copy of this email.
This e-mail is subject to the State Retention Schedule and may be made available to the public

February 4, 2026

To: West Linn Planning Commission

Regarding: CUP-25-02 / DR-25-02 / WAP-25-01

To the West Linn Planning Commission,

My name is Ed Schwarz and I am the Treasurer of the Savanna Oaks Neighborhood Association. I am here tonight representing SONA as requested by our members.

SONA does not oppose the construction of a new Operations Complex in West Linn. We do, however, object to the location chosen for it. We encourage you to deny this application and request that the location of the complex be changed to a safer location outside of the hazardous area where it is currently proposed.

Please consider the following concerns we have with the proposed complex. Our concerns include its location in a geologic hazard area as well as several areas where we believe the application does not meet West Linn Community Development Code requirements.

First, we disagree with staff's finding that Goal 7 of the West Linn Comprehensive Plan is met. Goal 7 states that, "Landslide areas are known hazards to safety." The city admits in their application that the complex will be built in a landslide area. Further, Policy 1 of Goal 7 states, "Require development and associated alterations to the surrounding land to be directed away from hazardous areas." As you have already heard in previous testimony tonight, the area where the complex is to be built has been deemed a hazardous area.

Please find that Comprehensive Plan Goal 7 and, specifically, Policy 1, have not been met by this application. The application should be denied.

In addition to the failure to meet the Comprehensive Plan, the application also fails to meet sections of the Community Development Code, specifically, sections 2.030, 55.100(B)(4), 55.100(I)(3), and 85.170(B)(2)(c)(1)(C).

The city has applied for a Conditional Use Permit for this partially residentially zoned site. Citing CDC 11.060, the city has identified this complex as falling under section 4, Public Support Facility. According to CDC 2.030, public support facilities are defined as "**Public services that deal directly with citizens**, to include meeting and hearing rooms, together

with **incidental storage** and maintenance of necessary vehicles, and exclude commercial use type ‘professional and administrative services.’ Typical use types are associated with governmental offices.” There are two parts of this section where the application does not meet the code.

First, note the phrase “Public services that deal directly with citizens...” Staff finding 65 of the staff report states, “Although the proposed facility is not intended to be directly used by the public on a daily basis...” This staff finding directly conflicts with CDC 2.030. The Operations Complex is not intended to deal with the public on a daily basis. It does not meet the definition of a Public Support Facility. The application does not meet CDC 2.030 and should be denied.

Second, note the phrase “incidental storage and maintenance of necessary vehicles”. “Incidental” is defined by the Oxford English Dictionary as “accompanying but not a major part of something”.

Per the application for a Conditional Use Permit, under the section Project Description, the city states that, “The project includes construction of two primary buildings...that includes **primary fleet repair facilities**, ancillary part storage, a sign shop, ancillary storage and general use spaces...” Note the use of the word “primary” when it comes to the fleet repair facilities. As demonstrated above, CDC 2.030 only allows “incidental storage and maintenance of necessary vehicles”. Therefore, the city’s intended use of this building for “primary fleet repair facilities” conflicts with the definition under CDC 2.030. The application fails to meet the definition of allowed uses for this partially residentially zoned property and should be denied.

CDC 55.010 states, “The purpose of the design review provisions is to establish a process and standards for the review of development proposals in order to conserve and enhance the appearance of the City and to **promote functional, safe, and innovative site development.**” Given that this complex is proposed to be developed on a steep, landslide-prone hillside and situated on a steep, very busy street, we do not see how it can be deemed to be either functional or safe. It will only be a matter of time before a serious traffic incident occurs between the high-speed traffic on Salamo and large city vehicles turning into, and out of, the complex. The application fails to meet CDC 55.010 and should be denied.

CDC 55.100(B)(4) states, “The structures shall not be located in areas subject to slumping and sliding. The Comprehensive Plan Background Report’s Hazard Map, or updated

material as available and as deemed acceptable by the Planning Director, shall be the basis for preliminary determination.” As you have heard tonight, the structures are proposed to be placed in a hazard zone which is subject to landslides which would include slumping and sliding. Therefore, this application does not meet CDC 55.100(B)(4) and should be denied.

CDC 55.100(I)(3) states, “...the applicant must demonstrate that the proposed methods of rendering known or potential hazard sites safe for development, including proposed geotechnical remediation, are feasible and adequate to prevent landslides or other damage to property and safety. The review authority may impose conditions, including limits on type or intensity of land use, which it determines are necessary to mitigate known risks of landslides or property damage.” We encourage the Planning Commission to review this code and determine if the application truly meets its requirements.

Lastly, CDC 85.170(B)(2)(c)(1)(C) requires a traffic impact analysis if:

(C) The development shall cause one or more of the following effects, which can be determined by field counts, site observation, traffic impact analysis or study, field measurements, crash history, Institute of Transportation Engineers Trip Generation manual, and information and studies provided by the local reviewing jurisdiction and/or ODOT:

- (1) An increase in site traffic volume generation by 250 average daily trips (ADT) or more (or as required by the City Engineer); or**

- (2) An increase in use of adjacent streets by vehicles exceeding the 20,000 pound gross vehicle weights by 10 vehicles or more per day;**

A Traffic Impact Analysis (TIA) was not performed for this application. Instead, staff accepted a “Trip Generation Report” from 2025 prepared by Kittelson and Associates. The Kittelson report did not study the actual location of the Operations Complex. It consisted of a daily trip count from the existing Public Works facility on Norfolk and Sussex streets.

This daily trip count average of 256 trips per day exceeded the 250 trips per day average to trigger a TIA. Additionally, the report did not consider the added traffic which will result from the additional city staff who will be housed in these new buildings (including Parks Department staff who will have their offices in the complex). In fact, the report incorrectly states that “Given that (1) the proposed Public Works Operations Facility will replace the

existing facility without expanding operational capacity, staffing, or fleet size..." The Kittelson report does not account for these additional staff trips and should not be accepted in place of a TIA.

Additionally, the Kittelson report did not provide an actual count as required in (2) above regarding the addition of vehicles exceeding 20,000 pounds to adjacent streets. Since Kittelson did not take an actual count of vehicles of this size, there is no way, without a TIA, to know for sure if this number of large vehicle trips will be exceeded.

Our code is clear, a Traffic Impact Analysis should have been performed. Therefore, the application does not meet CDC 85.170 and should be denied.

In summation, we ask that the Planning Commission deny the application on non-compliance with the CDC and the other grounds stated above. The city should be directed to find a safer, more accessible location for the Operations Complex.

Respectfully submitted,
Ed and Roberta Schwarz
Savanna Oaks Neighborhood Association
West Linn

February 4, 2026

Subject: CUP-25-02 / DR-25-02 / WAP-25-01

To the West Linn Planning Commissioners,

Please add this testimony from Savanna Oaks Neighborhood Association Officers, Ed and Roberta Schwarz to the public record for this application. They are representing the members of this NA.

The Operations Complex proposal, which is being heard tonight by this Planning Commission, is going to cost \$45 million dollars as per the local newspaper. You need to know the details of the proposal and the history of this area before you can decide if this is the safest and best place to build such an expensive development in West Linn with the people's money.

This piece of land, on the east side of Salamo at the intersection of Salamo and Greene St, received a rating of very high landslide susceptibility in the Natural Hazard Mitigation Plan. This is not a good place to develop. West Linn purchased this land from ODOT for \$396,000. It had been offered to federal and state agencies as part of the ODOT sales process to see if anyone else might want it. No one did. Apparently, the extreme slope and the landslide history of this area are the reasons why.

This proposal is for three buildings totaling 40,000 square feet on 33.02 acres zoned for R-10 residential with a stream and a wetland on it. The site contains areas of slopes greater than 25%. It has been identified in the maps that we have included (SLIDO) (exhibit 1), (DOGAMI) (exhibit 2), DOGAMI Deep Landslide Susceptibility Map update from 2013 (exhibit 3), and Landslide Susceptibility Exposure Map (exhibit 4) from the West Linn Natural Hazard Mitigation Plan document (page 43, https://westlinnoregon.gov/sites/default/files/fileattachments/planning/page/6219/west_linn_nhmp_addendum_091224_1.pdf) as having very high potential for a landslide.

The recent landslide history: eight miles of the second section of I-205 between Tualatin and West Linn began construction in 1968 and was completed on January 12, 1971. The work included the blasting of the basalt cliffs. Excavation for the project caused a series of landslides in 1969 that severely damaged the city's reservoir, destroyed three homes, and delayed the opening of this section for months. After several months of water rationing, the reservoir was replaced with state funding the following year. All these facts are supported in four articles printed in "The Oregonian" and "The Oregon Journal" from 1968 through 1971. There is also a November 10, 1969 letter in the staff's 732-page report that was submitted to the City of West Linn by CH2M (exhibit 5). It is page 707 of the staff report. It is included in our packet of information to you today and was emailed to you on Friday.

This large map from the Department of Geology and Mineral Industries (DOGAMI) was given to us many years ago by the former President of the Barrington Heights NA before he moved. He asked that we keep it handy in case it was ever needed. After the pre-application meeting for this proposal in May of last year, we found it, located a copy store that could make prints the size of Plat maps, and presented copies to the City of West Linn, and the current President of Barrington Heights NA, and the President of Willamette NA. We have also given each of you a copy of the relevant part of the map and one of the Statewide Landslide Information Layer for Oregon (SLIDO). Both show this area being considered for the Operations Complex proposed development. Both show that there is

landslide susceptibility. It is rated as very high in West Linn Natural Hazard Mitigation Plan. Please see the maps we have given you. They are not in the 732-page staff report and they should be.

You are here tonight to represent the best interests of the people of West Linn. We are requesting that you do not approve this proposal. This is an unacceptable risk to take. All the federal and state agencies that said "No" to this piece of land apparently knew this to be true. You know it now, too. Deny this application. Let the City find another, safer, spot for building the Operations Center.

Several codes are not being complied with in this application and that will be covered in the next part of our testimony.

Thank you,

Ed and Roberta Schwarz

Savanna Oaks Neighborhood Association

West Linn

February 4, 2026

To: West Linn Planning Commission

Regarding: CUP-25-02 / DR-25-02 / WAP-25-01

To the West Linn Planning Commission,

My name is Ed Schwarz and I am the Treasurer of the Savanna Oaks Neighborhood Association. I am here tonight representing SONA as requested by our members.

SONA does not oppose the construction of a new Operations Complex in West Linn. We do, however, object to the location chosen for it. We encourage you to deny this application and request that the location of the complex be changed to a safer location outside of the hazardous area where it is currently proposed.

In addition to concerns regarding its location in a geologic hazard area, SONA members expressed concerns about several areas where we believe the proposed complex does not meet West Linn Comprehensive Plan and Community Development Code requirements.

First, we disagree with staff's finding that Goal 7 of the West Linn Comprehensive Plan is met. Goal 7 states that, "Landslide areas are known hazards to safety." The city admits in their application that the complex will be built in a landslide area. Further, Policy 1 of Goal 7 states, "Require development and associated alterations to the surrounding land to be directed away from hazardous areas."

Please find that Comprehensive Plan Goal 7 and, specifically, Policy 1, have not been met by this application. The application should be denied.

In addition to the failure to meet the Comprehensive Plan, the application also fails to meet several sections of the Community Development Code.

The chosen site is partially zoned residential and the city has applied for a Conditional Use Permit. Citing CDC 11.060, the city has identified this complex as falling under section 4, Public Support Facility. As described in my written testimony, this application does not meet the definition of a public support facility as defined in CDC 2.030.

Also, the staff findings themselves directly contradict the requirement of CDC 2.030 that the development support “Public services that deal directly with citizens...”

The application further violates CDC 2.030 by stating that the complex will support primary fleet repair facilities. This is not allowed under CDC 2.030 which only allows “incidental storage and maintenance of necessary vehicles”. Therefore, the city’s intended use of this building for “primary fleet repair facilities” conflicts with the definition under CDC 2.030. The application fails to meet the definition of allowed uses for this partially residentially zoned property and should be denied.

The application also violates CDC 55.010 which states, “The purpose of the design review provisions is to...**promote functional, safe, and innovative site development.**” Given that this complex is proposed to be developed on a steep, landslide-prone hillside and situated on a steep, very busy street, we do not see how it can be deemed to be either functional or safe. The application fails to meet CDC 55.010 and should be denied.

CDC 55.100(B)(4) states, “The structures shall not be located in areas subject to slumping and sliding.” As you have heard tonight, the structures are proposed to be placed in a hazard zone which is subject to landslides which would include slumping and sliding. Therefore, this application does not meet CDC 55.100(B)(4) and should be denied.

CDC 55.100(I)(3) states, “...the applicant must demonstrate that the proposed methods of rendering known or potential hazard sites safe for development, including proposed geotechnical remediation, are feasible and adequate to prevent landslides or other damage to property and safety. The review authority may impose conditions, including limits on type or intensity of land use, which it determines are necessary to mitigate known risks of landslides or property damage.” We encourage the Planning Commission to review this code and determine if the application truly meets its requirements.

Lastly, as described in detail in my written testimony, the application violates CDC 85.170(B)(2)(c)(1)(C) because it did not include a Traffic Impact Analysis. A perfunctory trip generation report was instead used by staff to find compliance with 85.170. However, review of the requirements of this CDC section and a reading of the trip generation report shows that, based on the average number of vehicle trips per day, the report indicated that a Traffic Impact Analysis should have been performed.

Our code is clear; a Traffic Impact Analysis should have been performed. Therefore, the application does not meet CDC 85.170 and should be denied.

In summation, the members of Savanna Oaks NA ask that the Planning Commission deny the application on non-compliance with the CDC and the other grounds stated above. The city should be directed to find a safer, more accessible location for its Operations Complex.

Respectfully submitted,
Ed and Roberta Schwarz
Savanna Oaks Neighborhood Association
West Linn

Summary of Testimony- February 4, 2026, on CUP-25-02 / DR -25-02 /WAP- 25-01

We are here tonight representing the Savanna Oaks Neighborhood Association and have received the approval of the SONA members to do so through a unanimous vote at a Special Meeting of SONA. We request that this summary be placed in the Public Record along with the maps and exhibits previously submitted.

#1. The Operation Complex is going to cost \$45 million and will be located on a piece of land at the east side of Salano at the intersection of Salamo and Greene St. Please see location maps included in your packets that you were given tonight.

#2. It was purchased by West Linn from ODOT in 2021 for \$396,000. As part of the ODOT sales process, this parcel was first offered to federal and state agencies. None of them were interested.

#3. The proposal being heard tonight by the WL Planning Commission is for three buildings totaling 40,000 square feet. This land has a wetland and a stream on it. The stream is called Bernert Creek.

#4. The site contains areas of slopes greater than 25%. This area has been identified in the landslide maps we have included including SLIDO (Statewide Landslide Information Layer for Oregon) map (exhibit 1), DOGAMI (Department of Geology and Mineral Industries maps dated 2009 (exhibit 2) and 2013 (exhibit 3) and the map from the West Linn Natural Hazard Mitigation Plan (exhibit 4). All of these maps show this area to have landslide susceptibility and in West Linn's own Landslide Susceptibility Exposure map, from its Hazard Mitigation Plan, it is listed as **very high**.

#5. There is a geologically recent landslide history that goes along with these maps which dates to the construction of the I-205 freeway. Eight miles of the second section of this freeway between Tualatin and West Linn began in 1968 and was completed by January 12, 1971. The work included the blasting of the basalt cliffs. Excavation for the project caused a series of landslides in 1969 that severely damaged the city's water reservoir, destroyed three homes, and delayed the opening of this section for months. After several months of water rationing, the 500,000-gallon reservoir was replaced with one with a 600,000-gallon capacity. These facts are recorded in four articles we have discovered in the archives of the Oregonian and the Oregon Journal from 1968 to 1971. There was also an article about a high school senior, Stephen Rader, who was killed in June of 1968 near the Sunset area because of a rock falling during the construction. We have several articles about this young man's death and the family's suit for negligence which went all the way to the State Supreme Court and was won by his family in 1972.

#6. There is also a letter on the investigation of the reservoir and the landslide that was submitted to the city from CH2M (exhibit 5). It was dated November 10, 1969, and can be found in the staff report for this Operations Complex proposal on page 707 of the 732-page report.

#7. You will not find these maps or newspaper articles in that lengthy staff report. It took hours of investigation, discussions with experts, and speaking with long time West Linn residents for Ed and me, two Savanna Oaks NA officers, to put this information together for you. We even gave the city a copy of the 2009 DOGMA map, paid for with our own money, but it was not included in the 732-page staff report, just referenced.

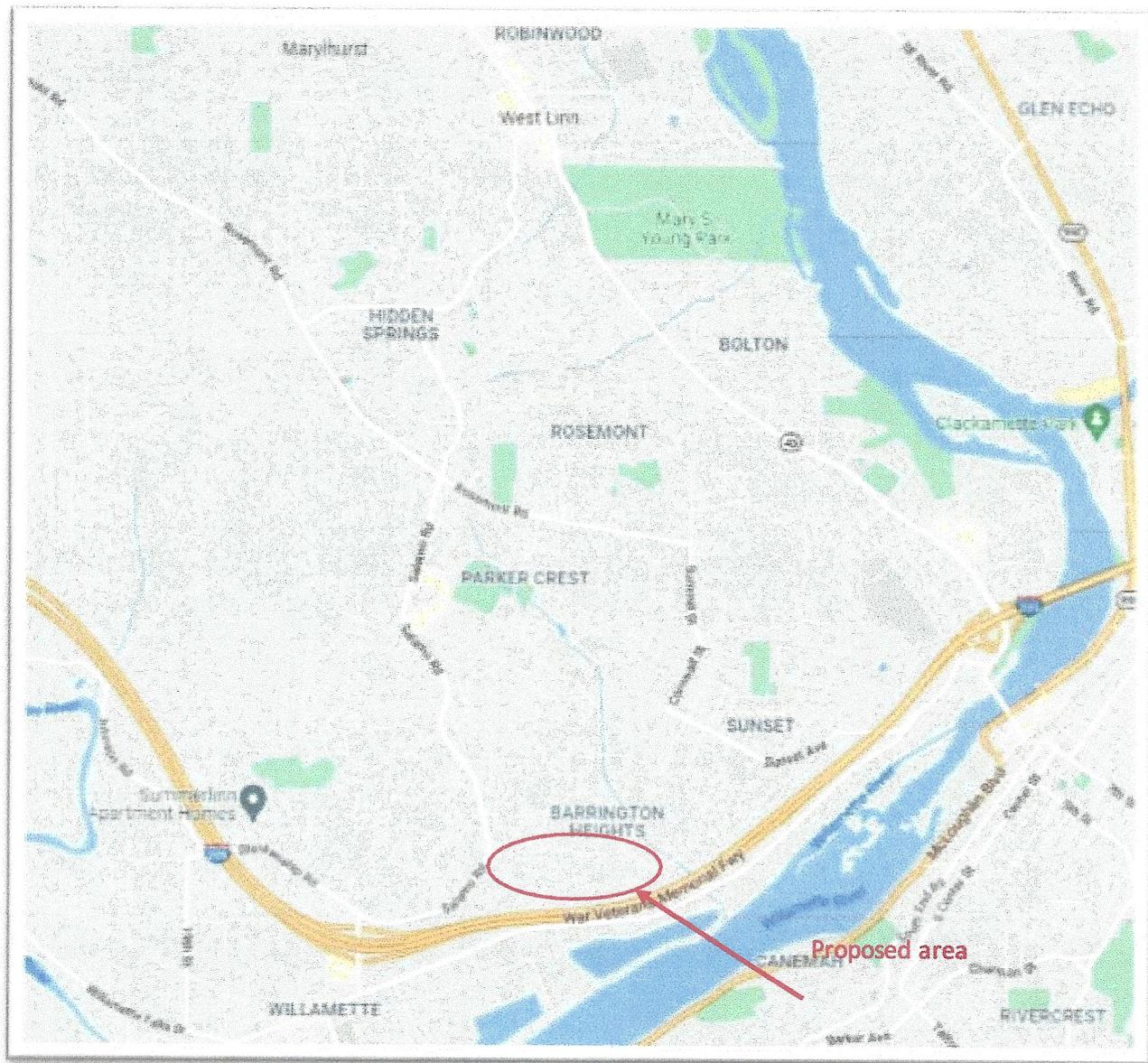
#8. Tonight, you, the Planning Commission, and later, the City Council, will be holding hearings on whether to approve this Operations Complex proposal. In light of our many days of research, we believe that this is an unacceptable risk to take. The federal and state agencies that were asked if they wanted this piece of land, all declined. We believe that the city should find another, safer, location for this to be built. We don't believe that it is wise to store and maintain the very public works equipment that we rely on in severe weather and hazardous conditions, in an area which is subject to a landslide which could destroy it or make it unavailable to use in an emergency. In this case it is not a question of **if** such a landslide could occur, but **when**.

Roberta and Ed Schwarz

Savanna Oak Neighborhood Association

West Linn

Figure 1: City-Wide Map





Legend

Zoning
Single and Multi Family R-2.1
Single and Multi Family R-3
Single-Family R-4.5
Single-Family R-7
Single-Family R-10
Single-Family R-15
Single-Family R-20
Single-Family R-40
Mixed Use
Neighborhood Commercial
General Commercial
Office Business Center
Campus Industrial
General Industrial
Unofficial Tax Lots
City Limit
Parks and Open Space
City Owned Property

